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August 13, 2025

VIA ECF

Hon. Jennifer H. Rearden
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Chet Michael Wilson v. Roman Health Ventures Inc.*, Civil Action No. 25-cv-3479 (JHR)
– Joint Letter Pursuant to Rule 16 Order

Dear Judge Rearden:

Pursuant to the Court's August 4, 2025 Rule 16 Order (ECF No. 15), the parties submit
this joint letter:

(1) Names of counsel and current contact information

For Plaintiff: Anthony I. Paronich, Paronich Law, P.C., 350 Lincoln Street, Suite 2400,
Hingham, MA 02043, Tel: (508) 221-1510, Fax: (508) 318-8100, anthony@paronichlaw.com.

For Defendant: Brendan T. Mahoney, Gordon Rees Scully Mansukhani, LLP, One Financial
Plaza, 755 Main Street, Suite 1700; Tel: (860) 278-7448; Fax: (860) 560-0185; Email:
bmahoney@grsm.com

The following attorneys intend to file *pro hac vice* applications on behalf of Defendant: Thomas
C. Blatchley and Andrew D. Bullard, Gordon Rees Scully Mansukhani, LLP, One Financial
Plaza, 755 Main Street, Suite 1700; Tel: (860) 494-7525; Fax: (860) 560-0185; Email:
tblatchley@grsm.com and abullard@grsm.com

(2) Nature of the action, principal defenses, and key legal/factual issues

This is a putative class action under the Telephone Consumer Protection Act ("TCPA"), 47
U.S.C. § 227, alleging that Defendant delivered or caused to be delivered multiple marketing text
messages to Plaintiff's and putative class members' telephone numbers despite their registration
on the National Do Not Call Registry. Plaintiff seeks statutory damages and injunctive relief on
behalf of a nationwide class.

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United States District Judge

Re: *Chet Michael Wilson v. Roman Health Ventures Inc.*, Civil Action No. 25-cv-3479 (JHR)
– Joint Letter Pursuant to Rule 16 Order

August 13, 2025

Page | 2

Key legal and factual issues include: (i) whether Defendant’s messages constitute “telephone solicitations” under the TCPA; (ii) whether prior express consent was obtained; (iii) whether Defendant’s conduct was willful; (iv) any implications of Plaintiff’s novelty number and history as serial litigant; and (v) whether class certification requirements are met.

(3) Jurisdiction and Venue

Jurisdiction lies under 28 U.S.C. § 1331 because the claims arise under federal law, the TCPA. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b) because Defendant resides in this District and a substantial part of the events giving rise to the claims occurred here.

(4) Status of any Defendants who have not appeared

All named Defendants have appeared.

(5) Existing deadlines, due dates, and/or cut-off dates

The Initial Pretrial Conference is set for August 20, 2025 at 11:30 a.m.

(6) Outstanding motions

There are no outstanding motions at this time.

(7) Pending appeals

There are no pending appeals.

(8) Discovery completed and needed

The Plaintiff served his first set of written discovery on August 7, 2025. Defendant requests bifurcated discovery. The Plaintiff opposes that request.

(9) Settlement discussions

The parties have engaged in preliminary settlement discussions but further information is needed about the size and scope of the putative class.

(10) Alternative dispute resolution

Hon. Jennifer H. Rearden
United States District Judge

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– Joint Letter Pursuant to Rule 16 Order

August 13, 2025
Page | 3

The parties have discussed ADR and plan on retaining a private mediator.

(11) Estimated length of trial

If certified as a class action: approximately 4–5 trial days. If not: approximately 2–3 trial days.

(12) Other information

None at this time.

Regards,

/s/ Anthony I. Paronich

Anthony I. Paronich

/s/ Brendan T. Mahoney
Brendan T. Mahoney